

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. <u>19-1631 JB</u>
)	
vs.)	
)	
KAMAL BHULA , a.k.a. "Rocky,")	
JONATHAN CRAFT , a.k.a. "Jonathan)	
Craft," a.k.a. "YN," a.k.a. "Wayan,")	
WILLIE HORTON ,)	
and)	
OMRAM, LLC ,)	Filed Under Seal
)	
Defendants.)	

**UNITED STATES' *EX PARTE* MOTION
TO UNSEAL REDACTED APPLICATIONS, AFFIDAVITS AND ORDERS
and
TO UNSEAL THE RECORD IN THIS CASE**

The United States of America, by and through its attorney, Alexander M.M. Uballez, Assistant United States Attorney, respectfully moves this Court to unseal the affidavits, applications, and warrants in Cause Nos. 19-MR-713, 19-MR- 714 and 19-MR-715 as well as the application and order entered as documents 6 and 7 in this cause number, subject to redaction. Furthermore, the United States respectfully request that the record in this matter be otherwise unsealed. In support of this motion, the United States submits as follows:

1. On June 12, 2019, a federal grand jury returned a ten-count indictment in Cause No. 19-CR-1631 JB, charging Kamal Bhula, Jonathan Craft, Willie Horton and Omram LLC with human and narcotics trafficking crimes and money laundering. Doc. 2.

2. On June 14, 2019, the Honorable Magistrate Judge Laura Fashing issued a writ of entry for every room of the Best Choice Inn located at 7640 Central Avenue Southwest, Albuquerque, New Mexico 87108 (“Best Choice Inn”) (doc. 7), seizure warrants for two bank accounts (19-MR-713 and 19-MR-715) and a search and seizure warrant for the office and two rooms of the Best Choice Inn (19-MR-714). Attached to the application for the writ of entry, as exhibits, are each of the affidavits in the search and seizure applications. Doc. 6.

3. Each affidavit includes information about individuals not included in the superseding indictment who remain potential targets. The United States seeks authorization from the Court to redact the names of individuals who remain potential targets, as well as identifying information relating to those targets.

4. Each affidavit includes the full birthday of a witness. The United States seeks authorization from the Court to redact the month and day in order to protect their privacy. The year of birth will remain intact.

5. Documentation of arrests, seizures and other activities affecting the organization find their way to members of the organization who remain at large. Providing potential targets with notice that they have been identified by law enforcement would give them an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior.

6. The following exhibits contain the United States’ requested redactions:

- a. Exhibit A: Application, and affidavit in 19-MR-714, also attached to document 6;

- b. Exhibit B: Application, and affidavit in 19-MR-713, also attached to document 6;
- c. Exhibit C: Application, and affidavit in 19-MR-715, also attached to document 6.

7. The record in this matter remains sealed as the corporation, Omram LLC, has not yet been “arrested.” As Bhula is the registered agent of that corporation, and he is arrested and otherwise on notice of these charges, the United States respectfully requests that the record in this matter be otherwise unsealed.

8. Given the nature of this motion, no concurrence was sought and it was filed it under seal.

CONCLUSION

WHEREFORE, for the foregoing reasons, the United States respectfully requests this Court grant the United States’ Motion to unseal the affidavits, applications, and warrants in Cause Nos. 19-MR-713, 19-MR- 714 and 19-MR-715 as well as the application and order entered as documents 6 and 7 in this cause number subject to the recommended redactions.

RESPECTFULLY SUBMITTED this 19th day of June 2019.

JOHN C. ANDERSON
United States Attorney

/s/
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